

**J. DOUGLAS WILSON (DCBN 412811)**  
Chief, Criminal Division

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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,

V.

RYAN ALLEN SISEMORE,  
a/k/a Ryan Allan Sisemore,  
VICTOR EASLEY,  
OSCAR VARGAS,  
RONNIE RICHARD TURNER,  
a/k/a Ronnie Allen Turner  
a/k/a Ronnie Richard Allen Turner  
a/k/a Ronnie Richard Alle Turner, and  
FIL FILIMON GUITRON III,  
  
Defendants.

Case No.14-CR-70886-MAG

STIPULATION AND ~~PROPOSED~~ ORDER  
EXCLUDING TIME UNDER SPEEDY TRIAL ACT  
AND RULE 5.1 FROM OCTOBER 7, 2014 TO  
NOVEMBER 21, 2014 FOR ALL DEFENDANTS

**STIPULATION**

Defendants Ryan Allen Sisemore, Victor Easley, Oscar Vargas, Ronnie Richard Turner, and Fil Filimon Guitron III (collectively, the “Defendants”) were charged by complaint in the above-referenced matter in the Northern District of California with conspiracy and possession with intent to distribute a controlled substance, to wit: heroin. In accordance with court orders, the Defendants were released following their arrest and placed in residential drug treatment programs the Eastern or Northern Districts of California. Since their initial appearance on the aforementioned charges, the Government has produced discovery related to numerous drug deals. The Government is also preparing additional discovery for production, including videos, that defense counsel will need time to review with their clients.

The parties hereby request that the preliminary hearing date in this matter be moved from October 7, 2014 to November 21, 2014. The parties make this request time to allow reasonable time for the effective preparation of counsel, as well as time to allow the parties to confer and determine whether a pre-indictment resolution is possible. Additionally, the parties request is reasonable in light of the difficulties associated with counsel conferring with their clients, many of whom reside in the Eastern District and/or may remain in residential drug treatment facilities. For the reasons stated, the parties believe that good cause exists to exclude and waive time under Federal Rule of Criminal Procedure 5.1(c) and (d), taking into account the public interest in the prompt disposition of a criminal case and Defendants’ consent.

IT IS SO STIPULATED.

DATED: October 3, 2014

\_\_\_\_\_  
/s/  
KATIE BURROUGHS MEDEARIS  
Assistant United States Attorney

DATED: October 3, 2014

\_\_\_\_\_  
/s/  
ANGELA MILELLA HANSEN  
Counsel for Defendant Fil Guitron, III

1  
2  
3 DATED: October 3, 2014

4 /s/  
5 JULIA MEZHINSKY JAYNE  
6 Counsel for Defendant Ryan Sisemore

7  
8 DATED: October 3, 2014

9 /s/  
10 ADAM PENNELLA  
11 Counsel for Defendant Oscar Vargas

12  
13 DATED: October 3, 2014

14 /s/  
15 SCOTT ALAN SUGARMAN  
16 Counsel for Defendant Ronnie Turner

17  
18 DATED: October 3, 2014

19 /s/  
20 KENNETH HOWARD WINE  
21 Counsel for Defendant Victor Easley

~~[PROPOSED]~~ ORDER

For the reasons stated by the parties, the Court finds that the aforementioned request is supported by good cause and made with the consent of Defendants. Fed. R. Crim. Proc. 5.1(c) and (d). The Court therefore finds that an exclusion of time between October 7, 2014 and November 21, 2014 is merited under Federal Rules of Criminal Procedure Rule 5.1(c) and (d) and moves the date of the preliminary hearing to November 21, 2014.

IT IS SO ORDERED.

Dated: October 6, 2014

  
HONORABLE KANDIS WESTMORE  
United States Magistrate Judge